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*Attorneys for Defendant*

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

TYREL BEERY, an Individual, MICHELLE  
LIEBE, an Individual, JENNIFER (RUBY)  
CHAVEZ, an Individual, ELIZABETH  
TARRIES, an Individual,

Plaintiffs,

v.

OREGON HEALTH AND SCIENCE  
UNIVERSITY, an independent public  
corporation,

Defendant.

Case No.: 3:23-cv-01555-JR

**DECLARATION OF SOPHIE SHADDY-  
FARNSWORTH IN SUPPORT OF  
DEFENDANT'S UNOPPOSED  
MOTION FOR EXTENSION OF TIME  
TO FILE ITS MOTION FOR AWARD  
OF ATTORNEYS' FEES**

I, Sophie Shaddy-Farnsworth do hereby declare and say:

1. I am an attorney licensed to practice law in the state of Oregon and am one of the attorneys representing Defendant Oregon Health and Science University ("OHSU") in the above-captioned litigation. I make this declaration based on my own personal knowledge and in support of OHSU's Motion for Extension of Time to file its Motion for Award of Attorneys'

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DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ITS  
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Fees.

2. OHSU requests an extension from April 22, 2025 to May 6, 2025 to file its Motion for Attorneys' Fees pursuant to the Court's Order on OHSU's Motion to Compel and for Sanctions (Dkt. 55.)

3. On April 1, 2025, the Court issued an Order granting Defendant's Motion to Compel and for Sanctions. (Dkt. 55.) In its Order, the Court stated that "defendant may file a motion seeking reasonable expenses incurred in making the motion to compel to be assessed against plaintiffs' counsel" and "advise[d] the parties to agree on a reasonable fee amount prior to filing the motion and then file a stipulated motion assessing the expenses as a sanction." (*Id.* at 4.)

4. The parties are continuing to confer and work in good faith to come to an agreement regarding a reasonable fee amount per the Court's Order and to limit motions practice before the Court to the extent possible. However, despite these efforts, additional time is needed to conclude conferral and to prepare a motion assessing OHSU's fees and expenses due to other conflicting deadlines and scheduling conflicts, including but not limited to nearly a dozen judicial settlement conferences counsel for the parties have scheduled in April 2025 involving other vaccine-related cases in this District. I am also scheduled to be out of the office for several days next week.

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5. This motion is being made in good faith and not for the purposes of delay.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: April 18, 2025

STOEL RIVES LLP

*s/ Sophie Shaddy-Farnsworth*

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